CADNA Comments Regarding the IANA Contract

NTIA's Request for Comments concerning the IANA functions contract is a welcome and crucial step in ensuring the best future model of Internet operation and governance. As stated in the RFC, the Internet's integral role in economic growth and innovation necessitates a stable, secure Internet DNS. CADNA is concerned that the current operation of the IANA functions by ICANN could compromise the security of the Internet.

The Internet has grown exponentially since ICANN was first awarded the IANA functions contract, and the current re-assessment of the relationship between ICANN and IANA is crucial. Should ICANN retain power to unilaterally both create and implement Internet policy? By holding the IANA functions contract in addition to its policy development functions, ICANN has ultimate authority over all aspects of Internet operation, and is not held accountable for its actions. Decisions made through ICANN's internal policy-making process are directly inserted into the Internet root as ICANN sees fit. If ICANN truly operated in the best interests of the majority of Internet users, this would not present as great an issue. ICANN's current policy-making process, however, relies disproportionately on input by domain name registries and registrars instead of the broader Internet community.

In light of technical innovation and the growth of the Internet community and market, the IANA functions may be better executed by a variety of technically specialized organizations. Instead of keeping the IANA functions together under ICANN, delegating the technical and administrative functions among other capable entities would ensure accountability in Internet operation. The organization that receives the IANA contract would serve the important purpose of advising on the technical impact of ICANN's policies before they are implemented.

CADNA trusts that NTIA will fully assess all options in awarding the IANA functions contract, and does not support any specific organization as contractor. Suggestions for possible alternative organizations are offered below as an indication that ICANN is not the only organization capable of secure and stable operation of the IANA functions. These suggestions do not detail all options, and only illustrate the fact that other choices exist.

The first IANA function, coordination of the assignment of technical protocol parameters, is currently developed and overseen largely by the Internet Engineering Task Force (IETF) and Internet Architecture Board (IAB). Delegation of this function in its entirety to these entities is one possible option. Organizational capability of these bodies has developed greatly in the past decade, and fully handling the first IANA function may not be outside their capacity.

The second IANA function, administration of responsibilities associated with Internet root zone management, currently allows ICANN to directly adjust the root zone in accordance with decisions made through its internal policy-making process. Until ICANN operates in a more transparent and accountable way, separating policy making power from root zone management capability provides a safety check for the Internet's continued stability. An international consortium of research universities may be an alternative option to provide root zone management services while drawing on the experience of individuals currently handling technical aspects of this function.

The third IANA function, allocation and management of IPv4 and IPv6 address space and Autonomous System Number (ASN) space, requires the close collaboration of Regional Internet Registries (RIRs). While leaving the administration of address space to the RIRs directly creates an accountability problem, this function does not depend on operation by ICANN specifically. An international, neutral organization with understanding of address space protocols as determined by the IETF is capable of managing this function.

Formalized channels for user input on the IANA functions should be implemented, and mechanisms ensuring coordination with these users should be codified in the IANA functions contract. Additional information related to the performance and administration of the IANA functions is also an absolute necessity, whether the IANA functions are kept under a single entity or delegated to various entities. Transparency and opportunity for user input are crucial components of Internet management.

Simply awarding the IANA functions contract to ICANN is the most convenient option, but may not be the best decision for operation and management of the Internet. If ICANN is able to fully audit its internal structure and de-couple its funding sources from the policy it creates, it could be the best choice to manage the IANA functions. Until ICANN is able to ensure this conflict of interest is resolved, however, the IANA functions should be awarded to another party.

CADNA appreciates the issuance of a Request for Comments on the IANA functions, and looks forward to NTIA's upcoming decisions regarding the IANA functions contract.